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**VIA ECF ONLY**

Hon. Brian M. Cogan, U.S.D.J.  
U.S. District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Full Circle United, LLC v. Bay Tek Entm't, Inc., No. 1:20-cv-03395-BMC**

Dear Judge Cogan:

We write as counsel for Defendant and Counterclaim Plaintiff Bay Tek Entertainment, Inc. ("Bay Tek") in response to the September 9, 2022 letter listing *sub judice* motions (ECF No. 140) filed by Plaintiff and Counterclaim Defendant Full Circle United, LLC and Counterclaim Defendant Eric Pavony (together, "FCU").

In its letter, FCU described its recently-filed objections to the Special Master's Order Nos. 18 and 19 (the "Objections," ECF Nos. 137, 138) as *sub judice* motions. For purposes of clarification, we write to inform the Court that Bay Tek has not yet, but intends to, file oppositions to both Objections. Based upon our reading of the relevant procedural rules, and the prior course followed by the parties under similar circumstances, we believe that Bay Tek's responses to the Objections are due on September 22 and 23, respectively.

To the extent that the Court is of the view that Bay Tek should submit its responses under a different schedule, Bay Tek of course will comply with that directive.

We thank Your Honor for consideration of this matter.

Respectfully,

Jeffrey M. Movit  
A Professional Corporation for  
MITCHELL SILBERBERG & KNUPP LLP